

Mr. Daniel Borunda
Environmental Management Division
USIBWC
4171 North Mesa St., C-100
El Paso, TX 79902

Dear Mr. Borunda:

In accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) Region 6 has reviewed the Draft Programmatic Environmental Impact Statement (DPEIS) for the improvements to the United States Section of the International Boundary and Water Commission, Rio Grande Flood Control Projects along the Texas-Mexico border.

EPA has rated the DPEIS as EC-2, i.e., Environmental Concerns and Requests Additional Information in the Final EIS. Detailed comments are enclosed which more clearly identify the areas to be addressed in the Final EIS and our recommendations to help strengthen the impact analysis and NEPA decision-making process.

Our classification will be published in the *Federal Register* according to EPA's responsibility under Section 309 of the CAA, to inform the public of our views on proposed Federal actions. If you have any questions, please contact Mike Jansky at (214) 665-7451. Please send our office five copies of the Final PEIS when it is sent to the Office of Federal Activities, EPA (Mail Code 2252A), Ariel Rios Building, 1200 Pennsylvania Ave, N.W., Washington, D.C. 20460.

Sincerely yours,

Cathy Gilmore, Chief
Office of Planning
and Coordination 6ENXP

Enclosure

mjansky:092407:mj:Rio Grande Flood Control Project

**DETAILED COMMENTS
ON THE
DRAFT PROGRAMATIC ENVIRONMENTAL IMPACT STATEMENT
FOR THE
RIO GRANDE FLOOD CONTROL PROJECTS**

1. In several places in the DEIS, the Clean Air Act is mistakenly referred to as the Clear Air Act. We suggest doing a word-search of the document and correcting the text as appropriate.
2. One of the three projects, the Rio Grande Rectification Project, has potential air quality impacts to Anthony, New Mexico (nonattainment for Particulate Matter (PM)₁₀) and/or El Paso County, Texas (nonattainment for carbon monoxide and PM₁₀). The document clearly indicates that the expected emissions of carbon monoxide is less than 10% of the county emissions inventory, but the emission level may still be high enough to trigger a general conformity applicability analysis. The emissions threshold for carbon monoxide is 100 tons per year (see 40 CFR 93.153). In table II-3.3 on page 3-18, combined emissions for El Paso and Hudspeth counties are listed as 251.72 tons per year. If these emissions are within the carbon monoxide nonattainment area, then a general conformity determination will be required and it may be necessary to mitigate or offset these emissions. More information is needed in the document to clarify. Careful attention should be given to emission in Doña Ana County as well, as emissions might affect particulate levels in Anthony, New Mexico.